

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION

IN RE: KIRKSEY, LEVERTIA

CASE NO. 17-11452

Debtor

MOTION TO SUSPEND CHAPTER 13 PAYMENTS

Now comes Levertia Kirksey by and through, Catherine Umberger, who files this Motion to Suspend their Chapter 13 Payments for three (3) months and would show as follows:

1. Debtor filed a Chapter 13 Bankruptcy on 04/20/2017. Debtor's plan was confirmed on 09/19/2017 for 36 months.
2. Debtor currently has about eighteen (18) months left in the Chapter 13 proceeding.
3. Debtor is experiencing financial difficulties and requests a suspension of payments.
4. Debtor requests that their plan payments be suspended for a period of three months (May 2019, June 2019, July 2019).
5. Debtor requests that any payments received during the suspension period be returned to her.
6. At the end of the three month suspension, trustee shall recalculate plan payment and increase wage order if necessary to cover the suspension and arrearage amount to ensure that the plan completes on time.

WHEREFORE, the debtor moves this honorable court to schedule a hearing on this Motion and allow the suspension of Chapter 13 Plan payments for a period of three months.

This the 11th day of April 2019.

/s/ Catherine Umberger
Attorney for Debtor
Mayfield Law Firm, P.A.
P.O. Box 9
Tupelo, MS 38802
MS Bar No. 104458
662-841-8844

CERTIFICATE OF SERVICE

I, **Catherine Umberger**, the undersigned counsel, do hereby certify that I have this day served a true and correct copy of the foregoing **Motion to Suspend Chapter 13 Payments** via electronic e-mail and/or United States mail, postage prepaid, upon the following:

o US Trustee USTPRegionAB.ECg@usdoj.gov

Locke Barkley

DATED: April 11, 2019

/s /Catherine Umberger
Catherine Umberger, ESQUIRE